EPA Reg. No. 86004-1 vol. 2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

AUG 8 2013

Mr. N. Bhushan Mandava, Agent Repar – Glypho, LLC 8070 Georgia Avenue, Suite 209 Silver Spring, MD 20910

Dear Mr. Mandava:

Subject:

Glyphosate Technical

Adding an Alternate Formulation, Alternate #2 CSF

EPA Reg. No. 86004-1

Submission Dated: July 15, 2013

The amendment referred to above, submitted in connection with registration under the Federal Insecticide Fungicide and Rodenticide Act (FIFRA), as amended is acceptable.

Alternate #2 CSF (dated 07-15-13) is acceptable and has been added to your record as current and updated.

Please contact Juanita Gilchrist at (703) 305-6965 or gilchrist.juanita@epa.gov if you have any questions.

Sincerely

Kable Bo Davis

Product Manager (25)

Herbicide Branch

Registration Division (7505P)



MANDAVA ASSOCIATES, LLC

CONSULTANTS IN SCIENCE, TECHNOLOGY AND REGULATORY AFFAIRS

1050 CONNECTICUT AVENUE, N.W., SUITE 1000, WASHINGTON, DC 20036

Telephone: (202)-223-1424/1747 · Fax: (202)-223-0141 / F.MAIL: Mandava@compuserve.com

<u>Sent by FEDEX</u> (Tracking # 8671 3222 8785)

July 15, 2013

Mr. Kable Bo Davis
Product Manager (PM 25)
Herbicide Branch
Registration Division (7504C)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Washington, D.C. 20460

SUBJECT: Amendment to CSF for 100% Repack

Product Name:

Glyphosate Technical

Company Name:

Repar-Glypho, LLC

EPA Reg. No.:

86004-1

Dear Mr. Davis:

Background: On June 24, 2103, on behalf of Repar-Glypho, LLC, we submitted an amendment to CSF for Glyphosate Technical (EPA Reg. No.: 86004-1) in the form of a Notification under PRN 98-10. Since it is an alternate formulation which is a 100% repack of the currently registered product , it is our understanding that this 100% repack will qualify for alternate formulation. Furthermore, the Agency has already reviewed and approved the product chemistry data for this source

Under PRN 98-10, we submitted this action as Notification.

EPA Findings: The Agency denied our request on the grounds that this action does not clearly fall with the scope of PRN 98-10 and it will require "additional administrative review" of the related files.

Following is the summary of the Agency's findings on this subject action: "Changes in the source of source of active ingredient via submission of a revised 100% repack are no longer being accepted by notification. All current and future requests must now be submitted as amendments." It gives us the impression that this is a policy change.

Accordingly, we have revised the subject action as an amendment to CSF.

The following materials are submitted in support of the amendment:

- 1) Application for Registration (EPA Form 8570-1)
- 2) Formulator's Exemption Statement (EPA Form 8570-27)
- 3) Two copies of proposed Confidential Statement of Formula (CSF) (EPA Form 8570-4)
- 4) Copy of original Confidential Statement of Formula (EPA Form 8570-4)

According to EPA, this action requires additional administrative review. Therefore, we request you to approve it as a minor formulation amendment.

If there further questions, lease contact us at 202-223-1424 or via e-mail mandaya@compuserve.com.

Sincerely,
N Therma Mardone

N. Bhushan Mandava

Agent for Repar-Glypho, LLC

Enclosure

Please read instructions on reverse before letting form.	Form	Apr 1. OMB No. 2	070-0060, Appro	yel expires 2-28-9
SEPA Environmental Protect Washington, DC 2	tion Agency	Registra V Amenda Other	HOII	entifier Number
Applicat	tion for Pesticide - S	ection		
1. Company/Product Number 86004-1	2. EPA Product N Kable Bo Day	•	3. Proposed C	lassification
4. Company/Product (Name) Glyphosate Technical	PM# 25		T I I I I I I I I I I I I I I I I I I I	11031110100
5. Name and Address of Applicant IInclude ZIP Codel Repar - Glypho, LLC 8070 Georgia Avenue, Suite 209 Silver Spring, MD 20910 Check if this is a new address	1 '			
	Section - II			* · · ·
Amendment - Explain below. Resubmission in response to Agency letter dated Notification - Explain below. Explanation: Use additional page(s) if necessary. (For sect 1) Submission of amendment of CSF for alternate source for Gly 2) Please direct all correspondence to: Mandava Associates, LLC	Agency "Me To Other -	** Application. Explain below.	* 1	<u> </u>
3) The contact person fax number is (202) 223 - 0141 and e-mail	Section - III	:rve.com,		
1. Material This Product Will Be Packaged In:	Lutter Catalla Danta de la		^	
Child-Resistant Packeging Yes No No If "Yas" No. per Unit Packaging Wo. per Unit Packaging wgt. container	Water Soluble Packaging Yes No If "Yes" No. p Peckago wgt Conta		Metal Plestic Glass Paper Other (Specify)	
be submitted	1 000000		, other (openity)_	
3. Location of Nat Contents Information 4. Size(s) P	Retail Container	5. Location of Lab	el Directions	
6. Manner in Which Label is Affixed to Product Lith Pap	ogreph O er glued nciled	ther		
	Section - IV			
1. Contact Point IComplete items directly below for identifica	tion of individual to be contact	ed, if necessery, to pre	cess this eppliceti	on./
Name N. Bhushan Mandava	Titlo Agent for Repar-Glypho,	LC LC	Telephone No. (Inc 202-223-1424	clude Area Code)
Certification of the statements I have made on this form of a scknowledge that any knowlingly false or misleading a both under applicable law.	nd all attachments thereto ara	true, eccurate and con y fina or imprisonment	nplate. Rece	Application ived Stamped)
2. Signatura N. Rhushan Mandae	3. Titlo Agent for Repar-Glypho, LLC	,		
4. Typed Name N. Bhushan Mandava	5. Data July 15, 2	013		



United States Environmental Protection Agency Washington, DC 20460

Formulator's Exemption Statement

(40 CFR 152.85)

Repar - Glypho, LLC 8070 Georgia Avenue, Suite 209 Silver Spring, MD 20910

Applicant's Name and Address

EPA File Symbol/Registration Number

86004-1

Product Name

GLYPHOSATE TECHNICAL

Date of Confidential Statement of Formula (EPA Form 857.9-4)

07/15/2013

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Glyphosate: N-(phosphonomethyl) glycine (CAS# 1071-83-6)

- (2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient, which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).
- (3) Indicate by checking (A) or (B) below which paragraph applies:
- (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

- (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on the with the EPA is complete, current, an accurate and contains the information required on the current CSF.
- (4) The following active ingredients in this product qualify for the formulator's exemption.

	Source	
Active Ingredient	Product Name	Registration Number
Glyphosate (Chemical Name:		
N-(phosphonomethyl) glycine		
(CAS# 1071-83-6)		
Signature	Name and Title	Date
N. Bhuston Manag		07/15/2013
EPA Form 8570-27 (Rev. 06-2004)		Copy 1 – EPA

Copy 1 -- EPA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

AUG 8 ZH3

Mr. N. Bhushan Mandava, Agent Repar – Glypho, LLC 8070 Georgia Avenue, Suite 209 Silver Spring, MD 20910

Dear Mr. Mandava:

Subject:

Glyphosate Technical

Adding an Alternate Formulation, Alternate #3 CSF

EPA Reg. No. 86004-1

Submission Dated: July 15, 2013

The amendment referred to above, submitted in connection with registration under the Federal Insecticide Fungicide and Rodenticide Act (FIFRA), as amended is unacceptable.

Alternate #3 CSF (dated 07-15-13) is unacceptable for the following reason:

The product label of record for Reg. # 86004-1 allows residential uses. However, the product label of the proposed alternate Al source for alternate #3 CSF (dated 07-15-13) prohibits residential uses. All use sites listed on the existing product label of Reg. No. 86004-1 must also be listed and supported on the product label of any proposed Al technical. Otherwise, the use site must be removed from the existing product label.

The Agency is unable to approve your submission at this time. Please amend accordingly, and resubmit to the Agency for review.

You may contact Juanita Gilchrist at (703) 305-6965 or gilchrist.juanita@epa.gov if you have any questions.

Singerely,

Kable Bo Davis

Product Manager (25)

Herbicide Branch

Registration Division (7505P)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

July 22, 2013

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

N. BHUSHAN MANDAVA, PH.D. MANDAVA ASSOCIATES, LLC REPAR-GLYPHO, LLC 1050 CONN. AVE., NW, STE 1000 WASHINGTON, DC 20036-

PRODUCT NAME: GLYPHOSATE TECHNICAL

COMPANY NAME: REPAR-GLYPHO, LLC

OPP IDENTIFICATION NUMBER: EPA FILE SYMBOL: 86004-1 EPA RECEIPT DATE: 07/19/13

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 25, at (703) 306-0415.

Sincerely,

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

FAST-TRACK AMENDMENTS - Completeness Screening Checklist

Expert's In-Processing Signature: EPA Reg. Number: 80004 EPA Receipt Date: Checklist Item N/A No 1 Application Form (EPA Form 8570-1) - signed? 2 Confidential Statement of Formula (EPA Form 8570-29) - signed? 3 Certification with Respect to Citation of Data (EPA Form 8570-34) signed? Formulator's Exemption Statement (EPA Form 8570-27) - signed? 4. Data Matrix (EPA Form 8570-35) [Applicable for adding me-too uses] 5 - signed? a) Selective Method? Cite-All Method? Public copy of Matrix provided? See PR Notice 98-5 6 Is Label included? (5 copies) a) Electronic Label submitted? Addin 100% repactes as alt. formulations Comments:



Fee for Service

{9384803~

This package includes the following	for Division		
New RegistrationAmendment	○ AD ○ BPPD ● BD		
□ Studies? □ Fee Waiver? □ volpay % Reduction:	Risk Mgr. 25		
Receipt No. S- EPA File Symbol/Reg. No. Pin-Punch Date:	938480 86004-1 7/19/2013		
This item is NOT subject t	o FFS action.		
Action Code: Requested: Granted: Amount Due: \$	Parent/Child Decisions:		
Inert Cleared for Intended Use Reviewer: Remarks:	Uncleared Inert in Product Date: 7/22/13		



MANDAVA ASSOCIATES, LLC

CONSULTANTS IN SCIENCE, TECHNOLOGY AND REGULATORY AFFAIRS
1050 CONNECTICUT AVENUE, N.W., SUITE 1000, WASHINGTON, OC 20036
Telephone: (202)-223-1424/1747 · Fax: (202)-223-0141 · E-MAIL: Mandava@compuserve.com

Sent by FEDEX (Tracking # 8671 3222 8785)

July 15, 2013

Mr. Kable Bo Davis Product Manager (PM 25) Herbicide Branch Registration Division (7504C) Office of Pesticide Programs U.S. Environmental Protection Agency Washington, D.C. 20460

SUBJECT: Amendment to CSF for 100% Repack

Product Name:

Glyphosate Technical

Company Name:

Repar-Glypho, LLC

EPA Reg. No.:

86004-1

Dear Mr. Davis:

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it is our understanding that this 100% repack will qualify for alternate formulation. Furthermore, the Agency has already reviewed and approved the product chemistry data for this source

Under PRN 98-10, we submitted this action as

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EPA Findings: The Agency denied our request on the grounds that this action does not clearly fall with the scope of PRN 98-10 and it will require "additional administrative review" of the related files.

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According to EPA, this action requires additional administrative review. Therefore, we request you to approve it as a minor formulation amendment.

If there further questions, lease contact us at 202-223-1424 of via e-mail mandava@compuserve.com.

Sincerely,

h Bluna Harden

N. Bhushan Mandava Agent for Repar-Glypho, LLC

Enclosure

Please read instructions on	×× × × × × × × × × × × × × × × × × × ×	eting form. United States I I Protecti	on Agency	Form App.	R	MB No. 20 egistrat mendm	ion	O. Approval expires 2-28-9 OPP Identifier Number
		Washington, DC 20460 Other		~.16				
		Applicati	on for Pesticid	e - Section	on I			
1. Company/Product Numba 86004-1	r		ł	oduct Manag 3 o Davis	jā r		3. Pr	oposed Classification
4. Company/Product (Name) Glyphosate Technical		***************************************	PM# 25					None Restricted
5. Name and Address of App Repar - Glypho, LLC 8070 Georgia Avenue Silver Spring, MD 209	e, Suite 209	odej	Ibl(i), my to: EPA Re	product is	simi)at	or identic	a) in co	F)FRA Section 3(cl(3) mposition and labeling
		***************************************	Section - II	t Name				
Amendment - Explain Resubmission in rosp Notification - Explain Explanation: Use addition 1) Submission of amendmen 2) Please direct all correspon 3) The contact person fax nu	below. below. bel pagofst if necessor t of CSF for alternate sidence to: Mandava As	ry. IFor section ource for Glyp sociates, LLC;	n I and Saction II.i hosale Technical (EPA 1050 Connecticul Aver	nue, NW / Sui	dated plication n bolow], ,	e e e e e e e e e e e e e e e e e e e	20036.
1. Material This Product Will	Be Packaged in:		Section - III	<u></u>				
Child-Resistant Packoging	Unit Packaging		Water Soluble Pec	kaging	2.	Type of Co	ontoinor	
Yes No	Yas No		Yes No	Metal Plastic Gloss				
* Certification must be submitted	if "Yes" Unit Packaging wgt	No. per . container	If "Yes" Package wgt	No. per contaîner			Paper Other (S	pacify)
3. Location of Ner Contonts Label C	i nformetion ontainor	4. Siza(s) Re	tail Conteiner	5	Location	on of Lebei	Directio	ns
6. Manner in Which Lebel is	Affixed to Product	Lithog Peper Stenc	reph glued ilod	Other				
			Section - IV					
1. Contect Point Complete	items directly below I	or identification	on of individual to be o	contacted, if	песезза	ry, to proc	ess this	application.)
Name N. Bhushan Mandava			Title Agent for Repar-Gl	ypho, LLC			elephon 02-22 3 -	e No. (Include Area Code) 1424
I certily that the steter I ecknowledge that any both under applicable I	y knowlingliy false or		all attachments there					6. Date Application Received (Stamped)
2. Signatura	. 40		3. Title Agent for Repar-Glyp	ho, LLC				
	ushon Mano	a	5. Deto	 				
4. Typed Name N. Bhushan Mandava			July 15, 2013					



United States

Environmental Protection Agency Washington, DC 20460

Formulator's Exemption Statement (40 CFR 152.85)

Applicant's Name and Address Repar - Glypho, LLC 8070 Georgia Avenue, Suite 209		EPA File Symbol/Regist 86004-1	ration Number	
Silver Spring, MD 20910		GLYPHOSATE TECHNICAL		
		Date of Confidential Sta	tement of Formula (EPA	A Form 8570-4)
		07/15/2013		
As an authorized representative of the applica	ant for registration of the produ	ct identified above, I certify	/ that:	
(t) This product contains the following act	ive ingredient(s):			i de viet
Glyphosate: N-(phosphone	omethyl) glycine			1
(CAS# 1071-83-6)	, , _ ,			; ;
(2) Of these, each active ingredient listed in formulation or repackaging another products from another person and meets the	oduct which contains that active	e ingredient which is regis	of that active ingredien tered under FIFRA Sec	t in the manufacturing, tion 3, is purchased by
(3) Indicate by checking (A) or (B) below v	which paragraph applies:			
That formula statement indicates, by coparagraph (1).		nber, and product name, th		
(B) The Confidential Statement of Fo accurate and contains the information	·	4) referenced above and	on file with the EPA is	complete, current, an
(4) The following active ingredients in this p	product qualify for the formulate	or's exemption.		
	Sour	ce		
Active Ingredient	Proc	luct Name	Regist	ation Number
Glyphosate (Chemical Name: N-(phosphonomethyl) glycine (CAS# 1071-83-6)	To the state of th			
			The state of the s	
Signature	Name and Title		Date	
N. Bhushan Mana	Agent for Repar-C	Olypho, LLC	07/15/2013	
EPA Form 8570-27 (Rev. 06-2004)			Co	py t – EPA

al classed by

Under the Federal Insecticide, Fungicide, and Rodenticide Aca, as amended, for the pesticide registered under EPA Reg. No. 86004-1

Glyphosate Technical

For Manufacturing and Formulating Into Herbicides Only

ACTIVE INGREDIENT:	
Glyphosate	97.3%
OTHER INGREDIENTS:	. <u>2.7%</u>
TOTAL:	100.0%

DANGER / PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

	First Aid
IFIN EYES	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact tenses, if present, after the first 5 minutes, then continue rinsing eye
IF SWALLDWED	Have person sip a glass of water if able to syrallow. Do not Induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.
IF INHALED	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth if possible.

control center or doctor, or going for treatment. For Medical Emergency Assistance, call the National Pesticide Information Center 1-800-858-7378.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

For chemical emergency: spill, leak, fire, exposure, or accident, call CHEMTREC 1-800-424-9300.

Manufactured for: Repar – Glypho, LLC 8070 Georgia Avenue / Suite 209 Silver Spring, MD 20910

NET CONTENTS: ____GALLONS

EPA Reg. No. 86004	EPA Est. No:

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals
DANGER: CORROSIVE. CAUSES IRREVERSIBLE EYE DAMAGE.
HARMFUL If INHALED. Do not get in eyes or on clothing. Wear goggles
or face shield. Wash thoroughly with soap and water after
handling. Remove contaminated clothing and wash clothing
before reuse.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Eliminator Systems (NPDES) permit and the permitting authority has been notified in writing prior to the discharge. Do not discharge effluent containing this product into sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

PHYSICAL or CHEMICAL HAZARDS

Solutions of this product should be mixed and stored using only stainless steel, aluminum, fiberglass, plastic and plastic-lined containers.

DO NOT MIX, STORE OR UTILIZE THIS PRODUCT OR SOLUTIONS OF THIS PRODUCT IN GALVANIZED STEEL OR UNLINED STEEL (EXCEPT STAINLESS STEEL) CONTAINERS OR TANKS. This product or solutions of this product react with such containers and tanks to produce hydrogen gas which may form a highly combustible gas mixture. This gas mixture could flash or explode, causing serious personal injury, if ignited by open flame, spark, welder's torch, lighted cigarette or other ignition source.

DIRECTIONS FOR USE

Read entire label before using this product. It is a violation of Federal law to use this product in any manner inconsistent with its labeling,

Use only for manufacturing, formulating, or repackaging into a herbicide for use in aquatic, industrial turf, omamental nursery, tree and forestry, residential sites and:

ANNUAL AND PERENNIAL CROPS:

CEREAL AND GRAIN CROPS - Barley, Buckwheat, Millet (pearl, proso), Oats, Rice, Rye, Quinoa, Teff, Teosinle, Triticale, Wheat (all types), Wild nice.

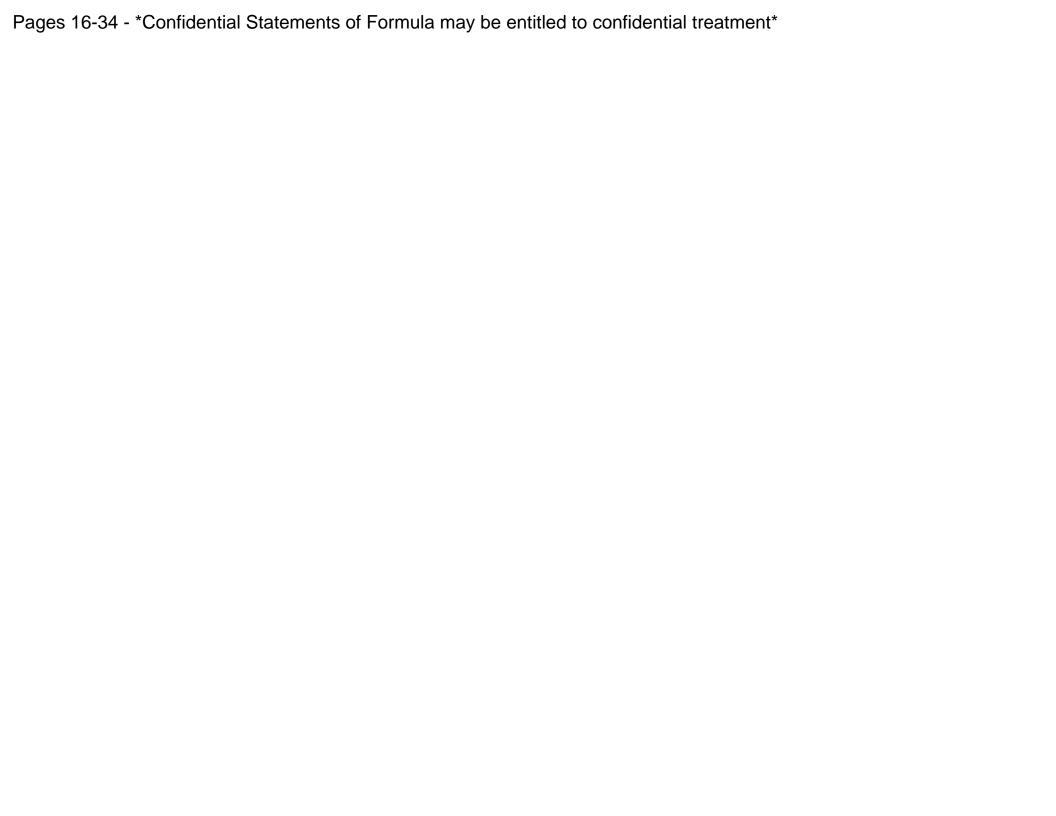
CORN - Field corn, Seed com, Silage com, Sweet corn and Popcorn

COTTON

GINSENG (Non-bearing)

GRAIN SORGHUM (Mile)

HERBS AND SPICES - Allspice, Angelica, Star anise, Annatto (seed], Balm, Basil, Borage, Burnet, Camomile, Caper buds, Caraway, Black caraway, Cardamom, Cassia bark, Cassia buds, Catnip, Cefery seed, Chervil (dried), Chive, Chinese chive, Cinnamon, Clary, Clove buds, Coriander leaf (cilantro or Chinese parsley), Coriander seed (cilantro), Costmary, Cilantro (seed), Cumin, Curry (leaf), Dill (dillweed), Dill (seed), Epazote, Fennel seed (common and Florence), Fenugreek, White ginger flower, Grains of paradise, Horehound, Hyssop, Juniper berry, Lavender, Lemongrass, Lovage (leaf and seed), Mace, Marigold, Marjoram Jinclyding oregano), Mexican oregano, Mioga flower, Mustard (seed), Nasturtium, Nulmeg, Parsley (dried), Pennyroyal, Pepper (black and white), Pepper leaves, Peppermint, Perilla, Poppy (seed), Rosemary, Rue, Saffron, Sage, Savory (summer and winter), Spearmint, Stevia leaves, Sweet bay, Tansy, Tarragon, Thyme, Vanilla, Wintergreen, Woodruff, Wormwood.



Page 35 - *Product ingredient source information may be entitled to confidential treatment*

